

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Union)	
Electric Company d/b/a Ameren Missouri)	File No. ET-2025-0184
for Approval of New Modified Tariffs for)	
Service to Large Load Customers)	

APPLICATION TO INTERVENE OF AMAZON DATA SERVICES, INC.

Pursuant to 20 CSR 4240-2.075, Amazon Data Services, Inc. (“ADS”) hereby files this Application to Intervene in the above-listed matter and states the following:

1. On May 14, 2025, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its “Application for Approval of Ameren Missouri’s Large Load Customer (“LLC”) Rate Plan and Associated Tariffs” in this docket requesting adoption of rates and tariffs applicable to large load customers (defined as customers with loads larger than 100 MW) throughout the service territory of Ameren Missouri (“LLC Rate Plan”).

2. The Missouri Public Service Commission (“Commission”) has issued an Order setting a deadline of June 12, 2025 for interested parties to intervene.

3. Amazon Data Services, Inc. is a subsidiary of Amazon.com, Inc. and an affiliate of Amazon Web Services, Inc. (collectively “Amazon”). The principal office of Amazon Data Services, Inc. is 410 Terry Avenue North in Seattle, WA 98109-5210. The contact information for Amazon’s attorney is set forth below.

4. ADS develops and operates data centers to support cloud computing services offered by Amazon Web Services. Amazon Web Services has the world’s largest and most extensive global infrastructure and provides the world’s most comprehensive and broadly adopted cloud computing services, offering over 240 fully featured services from data centers globally.

5. Within the last two years, Amazon has announced more than \$72 billion in planned infrastructure investments across multiple states such as Mississippi,

Indiana, Ohio, Georgia, North Carolina, and Pennsylvania¹ and is currently evaluating opportunities for further investments in additional states, like Missouri.

6. ADS has a unique interest in this docket as its future energy investment may be impacted by the outcome of this proceeding should it explore development of a data center within the Ameren Missouri service territory and to the extent this proceeding influences ratemaking principles applicable to large-load customers throughout the region.

7. Data center facilities that ADS develops are likely to require loads exceeding 100 MW. As such, ADS may qualify for the LLC Rate Plan at a future data center location within the Ameren Missouri service territory. Given that ADS may qualify as a customer under the LLC Rate Plan, it has an interest in this proceeding different from that of the general public and therefore meets the requirements of 20 CSR 4240-2.075(3)(A).

8. Granting ADS's intervention will also serve the public interest by assisting the Commission's record for decision in this case as to how the LLC Rate Plan may benefit the state and local economy through attracting customers like ADS to Missouri and what modifications to the LLC Rate Plan may enhance the realization of those benefits.

9. In addition, Amazon has experience in acquiring power and taking electric service in jurisdictions around the country. Amazon is also the world's largest corporate purchaser of renewable energy for the past five years and designs, owns, and operates data centers that provide critical infrastructure for its customers.

10. ADS has participated in similar tariff proceedings in several other

¹<https://www.aboutamazon.com/news/aws/aws-10-billion-investment-mississippi>; <https://www.aboutamazon.com/news/aws/aws-indiana-investment-11-billion>; <https://www.aboutamazon.com/news/aws/aws-continues-to-invest-in-ohio>; <https://www.aboutamazon.com/news/aws/aws-investment-georgia-ai-cloud-infrastructure>; <https://www.aboutamazon.com/news/aws/aws-investment-north-carolina-ai-cloud-infrastructure>; and <https://www.aboutamazon.com/news/aws/amazon-pennsylvania-investment-cloud-infrastructure-ai-innovation>.

states, e.g., Ohio and Indiana. By allowing ADS's intervention, the Commission can use that knowledge and experience to decide the case in a manner that best serves the public interest. ADS's intervention therefore meets the requirements of 20 CSR 4240-2.075(3)(B).

11. Pursuant to 20 CSR 4240-2.075(2)(F), ADS states that, at this early stage in the proceeding, ADS is unsure of the position it will take on the details of the LLC Rate Plan. Initially, ADS's position and interest in this docket will be to advocate for a fair and transparent process and to ensure that the LLC Rate Plan, if approved by the Commission, is reasonable and consistent with Missouri law. Because it is still analyzing the LLC Rate Plan, ADS will require additional information to determine if the LLC Rate Plan is reasonable as presented or if it requires modifications. ADS expects this information to be gathered during the discovery phase of this docket.

12. It is expected that ADS will have the facts necessary to form a position on the details of the LLC Rate Plan at some stage during or after the discovery phase.

13. Should the Commission grant this Application, notices and other correspondence in this case should be directed to the following persons:

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission on June 12, 2025.

/s/ Stephanie S. Bell